

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

LOVETT AUTO & TRACTOR
PARTS, INC., on behalf of itself and all
others similarly situated,

Plaintiff,

v.

CHAMPION LABORATORIES, INC.,
PUROLATOR FILTERS N.A. L.L.C.,
HONEYWELL INTERNATIONAL
INC., WIX FILTRATION CORP, LLC,
CUMMINS FILTRATION INC.,
DONALDSON COMPANY,
BALDWIN FILTERS INC., BOSCH
U.S.A., MANN + HUMMEL U.S.A.,
INC., and ARVINMERITOR, INC.,

Defendants.

Case No.: 08–CV–2046

Judge Robert W. Gettleman
Magistrate Judge Arlander Keys

**DEFENDANTS' MOTION TO STAY
ALL PRETRIAL PROCEEDINGS
PENDING THE MULTIDISTRICT LITIGATION
MOTION TO CONSOLIDATE AND TRANSFER**

Defendants,¹ through their attorneys, hereby move this Court to enter an Order staying all pretrial proceedings until the Judicial Panel on Multidistrict Litigation decides the two pending motions to consolidate and transfer this action. In support of this motion, Defendants incorporate by reference and rely on a separately filed Memorandum of Law In Support of Defendants' Motion to Stay Pretrial Proceedings and Declaration of

¹ Defendants are Champion Laboratories, Inc., Purolator Filters N.A. L.L.C., Honeywell International Inc., Wix Filtration Corp LLC, Cummins Filtration Inc., Donaldson Company, Inc., Baldwin Filters Inc., Robert Bosch LLC (incorrectly named by Plaintiffs as Bosch U.S.A.), Mann + Hummel U.S.A., Inc., and ArvinMeritor, Inc. For purposes of this motion only, all Defendants consent to the undersigned counsel signing this pleading on their behalf.

Patrick M. Collins. As set forth in the accompanying Memorandum of Law, such a stay is necessary to promote judicial economy, to avoid prejudice to Defendants, and would not prejudice Plaintiffs.

WHEREFORE, for the reasons stated in the Memorandum of Law In Support of Defendants' Motion to Stay Pretrial Proceedings, Defendants respectfully request that this Court stay all pretrial proceedings until the Judicial Panel on Multidistrict Litigation decides the two pending motions to consolidate and transfer this action.

Dated: May 30, 2008

Respectfully submitted,

/s/ Patrick M. Collins

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CERTIFICATE OF SERVICE

I hereby certify that, on this 30th day of May 2008, a copy of the foregoing Defendants' Motion to Stay All Proceedings Pending Motion to Consolidate and Transfer was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by email to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Patrick M. Collins